IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS WACO DIVISION

AMERICAN PATENTS LLC,

Plaintiff,

v.

XEROX CORPORATION and DAHILL OFFICE TECHNOLOGY CORPORATION D/B/A XEROX BUSINESS SOLUTIONS SOUTHWEST,

Defendants.

CIVIL ACTION NO. 6:21-cv-638-ADA

JURY TRIAL DEMANDED

JOINT MOTION TO STAY ALL DEADLINES AND NOTICE OF SETTLEMENT

Defendants Xerox Corporation and Dahill Office Technology Corporation d/b/a Xerox Business Solutions Southwest (collectively "Xerox") and Plaintiff American Patents LLC ("American") hereby submit this Joint Motion To Stay All Deadlines and Notice of Settlement and respectfully show the Court as follows:

- (1) Xerox and American have reached a settlement agreement resolving all matters in controversy between the parties in the above-referenced action and are in the process of completing the settlement.
- (2) Accordingly, Xerox and American submit that the Court's resources would best be served by a stay of all unreached deadlines for a period of thirty (30) days so that the announced settlement may be completed and appropriate dismissal papers thereafter filed with the Court.

WHEREFORE, Xerox and American request the Court grant this Joint Motion To Stay All Deadlines and Notice of Settlement and enter an Order granting a temporary stay of all upcoming deadlines for a period of thirty (30) days.

Dated: May 26, 2022

Respectfully submitted,

/s/ Zachariah S. Harrington

Matthew J. Antonelli Texas Bar No. 24068432 matt@ahtlawfirm.com Zachariah S. Harrington Texas Bar No. 24057886 zac@ahtlawfirm.com Larry D. Thompson, Jr. Texas Bar No. 24051428 larry@ahtlawfirm.com Christopher Ryan Pinckney Texas Bar No. 24067819 ryan@ahtlawfirm.com

ANTONELLI, HARRINGTON & THOMPSON LLP 4306 Yoakum Blvd., Ste. 450 Houston, TX 77006 (713) 581-3000

Stafford Davis
State Bar No. 24054605
sdavis@stafforddavisfirm.com
Catherine Bartles
Texas Bar No. 24104849
cbartles@stafforddavisfirm.com
THE STAFFORD DAVIS FIRM, PC
815 South Broadway Avenue
Tyler, Texas 75701
(903) 593-7000

Attorneys for American Patents LLC

/s/ Thomas Hoehner

Thomas Hoehner (pro hac vice)
Genevieve M. Halpenny (pro hac vice)
Denis J. Sullivan (pro hac vice)
BARCLAY DAMON, LLP
Barclay Damon Tower
125 East Jefferson Street
Syracuse, NY 13202
(315) 425-2700 (Telephone)
(315) 703-6249 (Facsimile)
thoehner@barclaydamon.com
dsullivan@barclaydamon.com
ghalpenny@barclaydamon.com

Barry K. Shelton
Texas State Bar No. 24055029
SHELTON COBURN LLP
311 RR 620, Suite 205
Austin, TX 78734-4775
bshelton@sheltoncoburn.com
(512) 263-2165 (Telephone)
(512) 263-2166 (Facsimile)

Attorneys for Defendants Xerox Corporation and Dahill Office Technology Corporation

CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system on May 26, 2022.

/s/Zachariah S. Harrington Zachariah S. Harrington